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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

UNITED STATES OF AMERICA,

Plaintiff,

14-CR-21-RMP-10

vs.

Motion to Stay Order of Release

SAMUEL G. WARD,

Without Oral Argument
March 18, 2014, at 6:30 p.m.

Defendant.

Plaintiff, United States of America, by and through Michael C. Ormsby, United States Attorney, for the Eastern District of Washington, and Jared C. Kimball and Aine Ahmed, Assistant United States Attorneys for the Eastern District of Washington, hereby moves the Court for an order staying Magistrate's Order of Release, filed March 18, 2014.

This Motion is based upon the files and records herein and the annexed declaration of Jared C. Kimball.

Dated: March 18, 2014.

MICHAEL C. ORSMBY
United States Attorney

s/ Jared C. Kimball
Jared C. Kimball
Assistant United States Attorney

1 I hereby declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, that:

2 1. On March 18, 2014March , a detention hearing was held in the above
3 entitled matter before the Honorable Magistrate Judge John Rodgers.

4 2. Magistrate Judge Rodgers orally ruled in favor of the release of the
5 Defendant, on certain conditions, pending trial.

6 3. The United States has now filed a Motion for Review of Magistrate
7 Judge Rodger's Order of Release and has requested an expedited hearing on this
8 matter.

9 4. The hearing is scheduled for March 19, 2014, at 9:00 a.m. before the
10 Honorable Chief Judge Rosanna Peterson.

11 5. I have contacted Defendant's attorney who has indicated to me that she
12 opposes a stay of the Order of Release pending the review hearing.

13 I hereby declare under penalty of perjury, that the foregoing is true and correct.

14 Executed this 18th day of March, 2014, at Spokane, Washington.

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22 *s/Jared C. Kimball*

23 Jared C. Kimball
24 Assistant United States Attorney

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2 **CERTIFICATE OF SERVICE**

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4 I hereby certify that on March 18, 2014, I electronically filed the foregoing with
5 the Clerk of the Court using the CM/ECF system which will send notification of such
6 filing to the following:

7 Ms. Adrienne Thomas
8 Thommes Law Office
9 1403 West Broadway
Spokane, Washington 99201

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12 *s/Jared C. Kimball*
Jared C. Kimball
13 Assistant United States Attorney

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